

## REMARKS

Claims 1-11 were previously cancelled, claims 12 – 22 are cancelled herein, and new claims 23 – 32 are added. Thus, claims 23 – 32 are presented for examination, and the objection to claim 19 is moot. Applicant respectfully requests reconsideration and allowance of the pending claims in view of the foregoing amendments and the following remarks.

Support for these new claims may be found in the specification and claims as originally filed, including, for example, paragraphs 00017, 00019, 00023, 00027 and associated Figures 1 – 3.

### Response to Rejections Under Section 103:

Claims 12 - 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over various combinations of U.S. Patent Appl. No. 2003/0200425 to Swaboda; U.S. Patent No. 6,948,155 to Agarwala; U.S. Patent Appl. No. 2002/0032559 to Hellastrand; U.S. Patent No. 6,470,482 to Rostoker; U.S. Patent Appl. No. 2001/0049593 to McConnell; U.S. Patent Appl. No. 2003/0004699 to Choi.

Applicant has cancelled claims 12 – 22 rendering these rejections moot.

Applicant submits that new claims 23 – 32 are patentable over the art of record and requests allowance of same. The Office bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. 103. In *re Fritch*, 972 F.2d 1260, 23 USPQ2d 1780 (Fed. Cir. 1992). To establish *prima facie* obviousness of a claimed invention, **all words** in a claim must be considered for judging the patentability of the claim against the prior art. In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether **the claimed invention as a whole** would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983)

Claim 23 recites, in part:

...creating a program list file from a software program comprising a list of **elements** representing the sequence of the software program...

running a hardware simulation of a circuit described in a hardware description language **(HDL)** in accordance with **an input data file compiled from the software program** as simulation code to obtain output signals;...

**coupling** by the debugger output signals and elements that correspond;

displaying **a combined representation** of the output signals and the elements ...; and

**synchronizing a first visual marking** of a selected element in the first area with **a second visual marking** of a corresponding output signal in the second area based on the coupling by the debugger.

As set forth above, the invention, as claimed, generally comprises a hardware circuit simulation using HDL to produce output signals combined with a software element listing, where the results are graphically displayed to the user in a combined display and with the elements and output signals coupled so that synchronized visual markings in the two displays are used.

Without conceding the propriety of any prior asserted combinations, Applicant respectfully submits that the cited art does not disclose at least the aforementioned features of claim 23. Specifically, Applicant submits that the art of record does not show this unique arrangement that produces this unique dual linked display between the HDL hardware simulation output signals and the elements of the program listing with visual synchronized marking between an element of the software program listing and the corresponding hardware simulated output signals.

Moreover, for at least the reasons discussed above, Applicant respectfully submits that claim 28, having similar features is also patentable and that the dependent claims are patentable at least based on their dependence as well as based on their own merits. Therefore, Applicant respectfully requests that the Examiner withdraw the Section 103 rejections and timely pass the application to allowance.

Serial No. 10/562,303  
Atty. Doc. No. 2003P08945WOUS

Conclusion

Accordingly, Applicant submits that all claims are in condition for allowance and request that a Notice of Allowance be issued. The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

Dated: Dec. 17, 2008

By: Janet D. Hood  
Janet D. Hood  
Registration No. 61,142  
(407) 736-4234

Siemens Corporation  
Intellectual Property Department  
170 Wood Avenue South  
Iselin, New Jersey 08830